

Fill in this information to identify the case:

Debtor 1 Frank G. Reichert

Debtor 2 Gail A. Reichert
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of PA
(State)

Case number 18-bk-03671-MJC

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Carrington Mortgage Services, LLC Court claim no. (if known): 8

Last 4 digits of any number you use to identify the debtor's account: 0 9 2 7

Property address: 164 Woodland Dr
Number Street
Thornhurst, PA 18424
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs. *Stay relief granted 5/23/2019. Loan paid in full by virtue of foreclosure proceedings*
- The next postpetition payment from the debtor(s) is due on: MM / DD / YYYY
- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.
- Creditor asserts that the total amount remaining unpaid as of the date of this response is:
- a. Total postpetition ongoing payments due: (a) \$ _____
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. Total. Add lines a and b. (c) \$ _____
- Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: MM / DD / YYYY

Debtor 1 Frank G. Reichert
First Name Middle Name Last Name

Case number (if known) 18-bk-03671-RNO

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Angela C. Pattison
Signature

Date 02 / 08 / 2023

Print Angela C. Pattison
First Name Middle Name Last Name

Title Creditor's Attorney

Company Hill Wallack LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 1415 Route 70 East, Suite 309
Number Street

Cherry Hill, NJ 08034
City State ZIP Code

Contact phone (856) 616 - 8086

Email apattison@hillwallack.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
(WILKES-BARRE)**

IN RE:

**Frank G. Reichert and Gail A. Reichert
aka Gail Ann Reichert fka Gail Murphy**
Debtor

CHAPTER 13

CASE NO.: **18-bk-03671-RNO**

Carrington Mortgage Services, LLC
Creditor/Movant

v.

**Frank G. Reichert and Gail A. Reichert
aka Gail Ann Reichert fka Gail Murphy**
Respondent

ORDER FOR RELIEF

ORDERED THAT: Relief is granted from the automatic stay provisions of 11 U.S.C. §362(a) to permit Movant to commence or continue its foreclosure on its mortgage on Mortgaged Premises located at 164 Woodland Dr., Thornhurst, PA 18424 (the “Mortgaged Premises”); to name the Debtor in the foreclosure suit solely for the purpose of foreclosing their interests in the Mortgaged Premises; and to allow the purchaser of the Mortgaged Premises at Sheriff’s Sale (or purchaser’s assignee) to take any legal action for the enforcement of its rights to possession of said Mortgaged Premises.

ORDERED THAT: The relief granted by this Order shall survive the conversion of this bankruptcy case to a case under any other Chapter of the Bankruptcy Code.

Dated: May 23, 2019

By the Court,



Robert N. Opel, II, Chief Bankruptcy Judge (DG)

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:

Case No. 18-bk-03671-RNO

**Frank G. Reichert
Gail A. Reichert**

Chapter 13

Debtor(s)

CERTIFICATE OF SERVICE

I hereby certify that on February 8th, 2023, a true and correct copy of the foregoing was served upon all interested parties to the Court's CM/ECF system and/or First Class U.S. Mail.

/s/ Angela C. Pattison
Angela C. Pattison
Hill Wallack LLP
1415 Route 70 East, Suite 309
Cherry Hill, NJ 08034

Debtor

Frank G. Reichert
40 Woodland Dr
Thornhurst, PA 18424-8063

Debtor

Gail A. Reichert
40 Woodland Dr
Thornhurst, PA 18424-8063

Debtor's Counsel

David J. Harris
69 Public Square, Suite 700
Wilkes-Barre, PA 18701

Trustee

Jack N Zaharopoulos
Standing Chapter 13
(Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Asst. U.S. Trustee

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101